Policy:

All University of Washington School of Medicine (UWSOM) faculty clinicians are subject to certain limitations on their Clinical Practice, including limitations on the locations in which they can practice without prior approval, as set forth in this policy. The purpose of these limitations is to ensure that the Clinical Practice activities of UWSOM faculty, including the locations of those activities, are aligned with the mission of UW Medicine and deployed in an appropriate and strategic manner so that we accomplish the goals of UW Medicine at each site that we own and/or operate.

Most UWSOM faculty clinicians provide clinical services to patients through the faculty practice plans: UWP and CUMG. There are also a limited number of UWSOM faculty clinicians who are not in CUMG or UWP. This policy applies to all UWSOM faculty who engage in Clinical Practice activities as part of their UW SOM duties regardless of their practice plan status.

This policy applies regardless of whether the faculty member is compensated or reimbursed for any Independent Clinical Practice or Off-site Clinical Practice. For example, the policy applies even if the faculty member proposes to engage in volunteer activities. Likewise, the policy applies regardless of whether services provided as Independent or Off-site Clinical Practice are billed to any patient or payor. The policy also applies regardless of whether the faculty member is on vacation, sabbatical, leave of absence, or some other status implying absence from regular duties for the University.

This Policy supplements and does not limit or replace University policies that may also apply to activities of faculty including but not limited to the Outside Professional Work Policy.¹

Definitions:

The following definitions apply to this Policy:

“Clinical Practice” is defined as the type of services for which a Washington state professional health care credential (e.g., M.D., N.P., P.A., etc.) is required. The following is a non-exclusive list of the type of activities that constitute Clinical Practice and for which site of practice pre-approval is required:

1. The delivery of clinical health care to a patient. This includes direct clinical contact and care of the patient, laboratory, pathology or radiology services associated with a specific patient’s care, or providing individual medical consultation or advice to a patient.
2. Directing other health care professionals in their treatment of an individual patient.

3. Medical Director services to a clinic, facility, or site in which health care services are provided.

“Off-site Clinical Practice” means a University Clinical Practice at a location or facility that is not a UW Medicine, Seattle Children’s or Affiliated Facility.

“University Clinical Practice” means a Clinical Practice that is done as part of the individual’s University, UWSOM, or practice plan duties or activities.

“Independent Clinical Practice” means a Clinical Practice completely separate from the individual’s University, UWSOM, and practice plan duties and/or activities.

“Seattle Children’s” means Seattle Children’s Hospital.

“UW Medicine, Seattle Children’s or Affiliated Facility” means a site or facility owned, operated, or managed exclusively by UW Medicine, Seattle Children’s, or UW and sites or facilities closely affiliated with UW Medicine, as designated for this Policy by the Committee. These facilities include only the following:

- University of Washington Medical Center
- Harborview Medical Center
- Northwest Hospital & Medical Center
- Seattle Children’s Hospital (See appendix A for a list of the Seattle Children’s Hospital pre-approved sites)\(^2\)
- Seattle Cancer Care Alliance (Only the SCCA inpatient and outpatient hospital-based clinics are designated as closely affiliated with UW Medicine under this definition. SCCA network or affiliated sites require Site of Practice approval.)
- UW Medicine Neighborhood Clinics
- Eastside Specialty Center
- Airlift Northwest
- Hall Health Student Health Primary Care Center
- Sports Medicine Clinic
- UW Intercollegiate Athletics
- VAPSHCS – American Lake
- VAPSHCS – Seattle
- Other VA sites
- The Puget Sound Blood Center
- North Seattle Surgery Center
- Valley Medical Center

“CUMG” means Children’s University Medical Group. CUMG is the faculty practice plan for UWSOM faculty who provide clinical care to pediatric patients.

\(^2\) When a new site becomes owned, operated or exclusively managed by Seattle Children’s, with the approval of the Dean, that site will be added to the list.
“UWP” means University of Washington Physicians. UWP is the faculty practice plan for UWSOM faculty who provide clinical care to adult patients.

“Site of Practice approval” is formal approval by the Dean, and the Seattle Children’s CEO as applicable, of an Off-site Clinical Practice for a particular faculty member or a department or division of faculty members.

**UWSOM Faculty Categories:**

**Faculty Practice Plan Members:**

Members of UWP and CUMG are governed by applicable UWSOM and University policies, procedures and rules, and are also subject to the corporate bylaws and member practice agreements of their respective practice plan.³

In general, full-time faculty (50% or greater total FTE) who are members of UWP or CUMG are not permitted to engage in Independent Clinical Practice.⁴ Members of UWP or CUMG who are part-time (less than 50% total FTE) are permitted to engage in Independent Clinical Practice as approved by the member’s department chair. All faculty who seek to engage in an Independent Clinical Practice must also follow the University of Washington Outside Professional Work Policy that requires pre-approval by the UW Medicine CEO and Dean of the UWSOM (Dean), among others, for any outside work for compensation.⁵

In addition to restrictions on Independent Clinical Practice, members are not permitted to engage in any Off-site Clinical Practice unless pre-approved by the Dean. For CUMG members, such Off-site Clinical Practice also requires pre-approval from the Chief Executive Officer of Seattle Children’s (Seattle Children’s CEO).

Review of proposed Off-site Clinical Practice is required to assure that the member is covered by the University’s professional liability program when providing clinical care to patients. Pre-

³“Member” includes all categories of membership within the faculty practice plan, except as otherwise specifically indicated in this policy.

⁴UWP Bylaws (Article I, Section B) state that “activities of the members of the Association shall be carried on at hospitals owned or managed by the University and at other health care agencies and institutions affiliated with the University, provided that an Association member may carry on activities at other agencies, institutions and places if such member’s carrying on of such activities at such agency, institution, or place is approved by the Dean after consultation with the Board.”

⁵CUMG Bylaws (Article I, Section B) provide that activities of the Professional Members of the Association shall be carried on at hospitals and clinics owned or managed by Seattle Children’s and/or the University and at other health care agencies, institutions, and places affiliated with Seattle Children’s and/or the University of Washington School of Medicine, provided that a Professional Member may carry on activities at other agencies, institutions, and places after consultation with the CUMG Board and as approved by the CEO of Seattle Children’s and the Dean.

⁵See, University Handbook, Vol. 4, Chapter 6. The University Outside Work Policy is available on line at: http://www.washington.edu/faculty/facsenate/handbook/04-05-06.html
approval for Off-site Clinical Practice is required for all categories of membership in the practice plans. Liability coverage is not typically provided by the University for Medical Director Services at a non-UW Medicine site or facility.

Faculty Who Are Not Practice Plan Members:

There are a limited number of faculty who engage in clinical activities as part of their UW SOM duties but who are not members of CUMG or UWP. Occasionally it is proposed that one of these faculty be engaged in Off-site Clinical Practice as part of their faculty responsibilities. For these Off-Site Clinical Practice activities, the Dean, through his designee the Vice Dean for Clinical Affairs, exercises the authority to review and approve off-site clinical practice agreements involving School of Medicine faculty by requiring arrangements for Off-site Clinical Practice to have advance Site of Practice approval. Any proposal by a faculty member who is not a member of CUMG or UWP to engage in an Independent Clinical Practice must be reviewed and approved by the Dean under the University and UW SOM rules governing outside professional work, including the University of Washington Outside Professional Work Policy.

Procedures:

Approval for Off-site Clinical Practice:

Site of Practice approval is required for all Off-Site Clinical Practice activities. When a faculty member or department identifies an opportunity for Off-site Clinical Practice that will support and further the mission of UW Medicine, the Chair submits a request for Site of Practice approval to the Committee for consideration. When the faculty member seeking approval is a member of CUMG, the request for Site of Practice approval is also submitted to the CUMG Board of Directors.

Note – Faculty should not assume that a WWAMI site or closely affiliated entity constitutes a pre-approved Site of Practice. If a site is not a UW Medicine, Seattle Children’s or Affiliated Facility as defined in this policy, Site of Practice approval is required before Off-site Clinical Practice may begin.

A template to assist with Site of Practice approval requests may be found at https://depts.washington.edu/uwsom/clinical-affairs/sites-practice. Site of Practice approval requests are reviewed by the Committee for recommendation to the Dean and Seattle Children’s CEO, as applicable.

The committee evaluates each request for Site of Practice approval against the following non-exclusive list of questions:

1. Does the proposed request align with and support mission-related activities or programs and are the activities consistent with the teaching and clinical care mission of UW

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Medicine and/or Seattle Children’s? (E.g., is increasing access to this patient population necessary for academic accreditation, does increasing access to this patient population enhance the skill and experience of faculty who teach the procedures, does access to a community setting to provide these services enhance the teaching and research patient pools, does providing care to this site address identified community access needs and benefit the public, etc.).

2. How do the patients served by the proposed request fit within the teaching, research, and/or clinical care activities of UW Medicine and/or Seattle Children’s? (E.g., does the request help provide necessary clinical services to underserved patient population, does the request increase access for teaching and research to patients with a particular medical or genetic condition, does the request increase community access to expert and experienced faculty health care providers, etc.)

3. If approved, does the arrangement impair the ability of UW Medicine or Seattle Children’s to meet the needs of patient populations at UW Medicine or Seattle Children’s Facilities?

4. If the proposed arrangement alters the ability for existing clinical practices to meet UW Medicine or Seattle Children’s patient needs, what accommodation is in place or needs to be in place to assure continued access and care for our patients?

5. What is the proposed arrangement for billing of clinical services or reimbursement of administrative services provided by faculty? Does the proposed arrangement reduce any faculty member’s clinical activities billed through either UWP or CUMG to less than 75% of their total clinical activities?

6. Does the proposed site or facility provide professional liability coverage for faculty providing clinical services under the proposed arrangement?

7. If the proposal includes administrative services (such as medical director services) provided by faculty, what liability coverage is being provided by the non-UW Medicine site for these services?

8. Will fellows, residents or medical students accompany the faculty member(s) to the Site of Practice?

9. If residents will be involved and the faculty member intends to bill for the faculty member’s services combined with the resident’s services under the Teaching Physician rules, is the required non-hospital site agreement in place?

10. How will medical records be maintained and accessed for billing and operations purposes?
11. Does the department chair, division chief, department head, or any of the faculty proposed to engage in the Off-site Clinical Practice have a personal or financial interest in the site or facility?

Once a request for Site of Practice approval is completed and submitted by the chair, the Committee considers the request and may speak directly to the chair, faculty member, or others as appropriate to evaluate the request. The committee issues a recommendation to the Dean, or Dean and Seattle Children’s CEO as applicable. Such recommendation may be subject to certain restrictions or conditions which, in the discretion of the Committee, are appropriate to assure that the Off-site Clinical Practice supports the missions of UW Medicine and the University, and Seattle Children’s as applicable, and also that risks are appropriately managed. Such conditions may include a time limitation on the approval and a requirement for follow up information. The committee may also require written documentation of the arrangement between the UWSOM or Seattle Children’s and the outside entity.

Approval for Independent Clinical Practice:

In exceptional instances, a department chair may determine that circumstances warrant an exception for an individual full-time practice plan member to be permitted to engage in or maintain an Independent Clinical Practice. In these situations, the chair should provide the committee with relevant information to support an exception and the committee will provide a recommendation to the Dean or Dean and Seattle Children’s CEO as applicable. Committee review of a request for a full-time faculty member to engage in an Independent Clinical Practice is in addition to the requirements set forth in the University’s Outside Professional Work Policy.

Administrative Services at a Non-UW Medicine Site of Practice:

UW does not typically provide professional liability coverage for the provision of administrative services (e.g., services normally provided by a medical director) at non-UW Medicine sites of practice. Instead, the purchaser of the administrative services is required to provide the professional and other liability coverage. Faculty and chairs should contact the Office of Risk Management for information as to coverage requirements for these activities. Often, facilities may offer coverage for individuals performing these services. Requests for Site of Practice approval for administrative services must include a copy of a certificate of insurance from the facility as evidence of such coverage.